

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES, *et al.*,**

***Plaintiffs,***

**- against -**

**GOOGLE LLC,**

***Defendant.***

**Civil Action No. 1:23-cv-00108  
(LMB) (IDD)**

**DECLARATION OF YVONNE RESHETAR IN SUPPORT OF DEFENDANT  
GOOGLE LLC'S MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, YVONNE RESHETAR, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Real Estate and Workplace Services Business Intelligence Manager at Google LLC ("Google"), the Defendant in the above-captioned case. I have worked for Google since January 25, 2016, and am based in the company's office in Boulder, Colorado.
2. I respectfully submit this Declaration in support of Google's Motion to Transfer under 28 U.S.C. § 1404(a), dated February 17, 2023. This declaration is based on my personal knowledge and investigation. If called as a witness in this matter, I could and would testify competently to all of the information contained in this Declaration.
3. Much of Google's advertising technology business is based in New York, New York.
4. Google's New York, New York office is Google's largest office (by headcount) outside of California, with approximately 15,360 full-time employees based there.

5. Google has approximately 875 full-time employees located in Virginia, making up 0.007% of its U.S. workforce.


6. Google served initial disclosures in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (S.D.N.Y.) on January 13, 2023. Pursuant to Federal Rule 26(a)(1)(A)(i), Google identified twenty-eight then-current Google employees as likely to have discoverable information that Google may use to support its defenses in these actions. For each of the twenty-eight individuals, I determined the location of their most recent assigned work office using Google's internal directory. Of these twenty-eight individuals, eight are (or were last) located in New York, and zero are (or were last) located in Virginia. This information is current as of February 15, 2023.

7. Google received initial disclosures from plaintiffs in *In re Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (S.D.N.Y.) on January 13, 2023. In total, plaintiffs' initial disclosures identify 157 current or former Google employees. For each of the 157 individuals, I determined the location of their most recent assigned work office using Google's internal directory. Of these 157 individuals, thirty-nine are (or were last) located in New York, and zero are (or were last) located in Virginia. This information is current as of February 15, 2023.

8. It would be inconvenient and disruptive to Google's business for Google employees to be subject to multiple depositions in connection with the same allegations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 17, 2023, in Boulder, Colorado.



Yvonne Reshetar